

AFFIDAVIT OF MARY B. HIGHFIELD

IN THE STATE OF OHIO)
)
COUNTY OF SCIOTO) ss:

I, Mary B. Highfield, swear that the following is true:

1) Since December 2000 I have been the Legal Secretary for the Warden at the Southern Ohio Correctional Facility.

2) Prior to working as the Legal Secretary for the Warden, I worked for five years as the paralegal for the law library at the Southern Ohio Correctional Facility.

3) Donald Hall resides at the Southern Ohio Correctional Facility.

4) During my employment with the Southern Ohio Correctional Facility, I have had numerous dealings with Mr. Hall.

5) After my years of experience and contact with Mr. Hall, it is my opinion that Mr. Hall's behavior and mental capacity is that of a three-year-old child.

6) On June 27, 2005 Assistant State Public Defender Katherine A. Szudy contacted me requesting my assistance with Mr. Hall's case.

7) Attorney Szudy informed me that in order for Mr. Hall's case to proceed, he would need to complete an Affidavit of Indigency. Because Attorney Szudy was aware of Mr. Hall's low level of comprehension and illiteracy, she wanted to know if I could help Mr. Hall understand the questions that he needed to answer.

8) I informed Attorney Szudy that Mr. Hall's level of comprehension was that of a three-year-old child, and that all Mr. Hall could possibly do with the affidavit would be to sign his name.

9) Attorney Szudy sent me the affidavit, and I met with Mr. Hall.

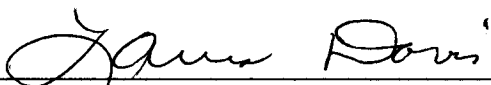
10) Mr. Hall did not understand the questions regarding assets and monetary amounts in the Affidavit of Indigency. Mr. Hall did not even remember who his attorney was. I explained as best I could that the form was a legal form explaining that he was poor. But, due to Mr. Hall's low level of comprehension, he did not understand, and therefore could not answer, any of the questions in the affidavit.

Further affiant sayeth naught.



MARY B. HIGHFIELD

Sworn to and subscribed to in my presence this 15th day of July, 2005.



NOTARY

LAURA DAVIS
NOTARY PUBLIC, STATE OF OHIO
MY COMMISSION EXPIRES 11-30-2005